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**AFFIDAVIT IN SUPPORT OF**  
**APPLICATION FOR CRIMINAL COMPLAINT**

I, Melissa A. Macaron, a Special Agent with the Federal Bureau of Investigation, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since December 2020. I am currently assigned to the Winchester Resident Agency out of the FBI Richmond Field Office and am a member of the 1-81 Human Trafficking Task Force (“I-81 HTTF”). As an FBI Special Agent, I investigate a variety of violations of criminal law, including crimes against children, human trafficking, civil rights, and bank robberies, among others.

2. As a law enforcement officer, I have experience in numerous investigative techniques, including, but not limited to, visual surveillance; witness and subject interviews; consensual monitoring; analyzing records associated with social media accounts, IP addresses, phone numbers; and the execution of search warrants. Through my work, I have learned from more senior agents and become familiar with methods and means used by individuals involved in the sexual exploitation of children and adults to perpetrate their crimes.

3. I have personally participated in this investigation and have obtained the facts set forth in this affidavit through my participation in the investigation described below, including from oral and written reports of other law enforcement officers, and from records, documents, and other evidence obtained during this investigation. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. My understanding of the facts and circumstances described herein

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may evolve or change as new information is developed during this investigation.

4. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that beginning in or about December 2021 and continuing through on or about July 24 2022, in the Western District of Virginia, Winchester Division and elsewhere, **William Oneil MURRAY III** (“**MURRAY**”) committed the offense of sex trafficking through force, fraud, and coercion, in violation of 18 U.S.C. §§ 1591(a) and (b)(1), with respect to Adult Victim 2 (“**AV2**”).

## **II. PROBABLE CAUSE**

5. In July 2022, FBI Winchester Special Agents initiated an investigation into sex trafficking by **MURRAY**. Since the initiation of the investigation, five (5) adult sex trafficking victims of **MURRAY**’s have been identified and interviewed. The adult victims described being sex trafficked by **MURRAY** from as early as 2015 through as recently as July of 2022.

### **A. MURRAY’s Control and Coercion Described by Victims of Sex Trafficking**

6. The victims report similar conduct by **MURRAY**. As examples, the victims all stated that **MURRAY** had multiple individuals “working” for him at a time and these victims completed commercial sex acts at his direction. The individual victims were not certain how many other victims worked for **MURRAY** at any given time because **MURRAY** frequently kept them in different locations. Based on my training and experience, it is common for individuals perpetrating sex trafficking of victims to have a stable of victims to service their customers. The victims’ descriptions of **MURRAY**’s conduct is therefore consistent with this pattern.

7. Each victim stated that **MURRAY** maintained strict control over their activities. **MURRAY** required the victims to stay in communication with him regarding their commercial

sex “dates.”<sup>1</sup> **MURRAY** called the victims within a few minutes of the beginning of their “date” to verify that the clients had paid the victims for the commercial sex acts. Based on my training and experience, I know that individuals involved in sex trafficking victims will monitor their activities to track expected payments for their victims’ exploitation.

8. Each victim stated that **MURRAY** did not allow the victims to go anywhere without **MURRAY**’s permission. For example, multiple victims described not being allowed to leave the hotel room to go to the hotel front desk. One victim detailed that **MURRAY** did not allow her to go outside to smoke a cigarette without his express permission. When the victims did try to leave without first asking permission, **MURRAY** would find them. As punishment for leaving, **MURRAY** would physically or verbally abuse them or withhold drugs from the women to make them ill.

9. Each victim stated that **MURRAY** controlled them using narcotics. **MURRAY** did not allow the victims to obtain drugs from anyone other than **MURRAY**. Because the victims were not allowed to get narcotics from any other supplier, **MURRAY** was the sole person who controlled their access to drugs. The victims were dependent on their narcotic of choice, which would often be heroin. Without heroin, the victims described getting “dope sick.”<sup>2</sup> Thus, **MURRAY** stood between their addiction and the threat of withdrawal. **MURRAY** withheld heroin and other drugs from the victims until they completed the dates **MURRAY** arranged for them. **MURRAY** also used the threat of letting the victims get dope sick to get the victims to obey him. The fear of experiencing dope sickness or going through withdrawal often incentivized the victims into obeying **MURRAY**.

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<sup>1</sup> Based on my training and experience, the term “date” is used the commercial sex trade to convey the occurrence of a sexual activity in exchange for money from a “customer.”

<sup>2</sup> Based on my training and experience, “dope sick” is a common term for the sickness experienced during withdrawal from heroin and other opiates. Some of the symptoms include insomnia, vomiting, nausea, chills, body aches, diarrhea, and night sweats. One victim described being “dope sick” as being like the flu, but five times worse.

10. Almost every victim stated that **MURRAY** took their phone when they started working for him. **MURRAY** occasionally allowed the victims to use one of **MURRAY**'s phones, but only to talk to clients. **MURRAY** would regularly get print outs of call and text logs from all these phones to make sure the victims were not texting or calling anyone other than clients. **MURRAY** also unplugged the phones in the hotel rooms so that the victims were not able to make calls from the hotel.

11. Almost every victim stated that either **MURRAY** (or one of the men working for **MURRAY**) would wait in the parking lot during their dates. **MURRAY** would also leave the victims under the watch of one of **MURRAY**'s associates if he had to leave for an extended period of time.

12. Victims were expected to complete multiple commercial sex acts each day to earn money for **MURRAY**. Almost every victim stated that **MURRAY** did not like them to sleep because if they were sleeping, they were not earning money. Multiple victims stated that **MURRAY** forced them to take ecstasy to stay awake longer to complete as many dates as possible for **MURRAY**.

13. Each victim stated that **MURRAY** set the prices for commercial sex acts. Victims were required to give all commercial sex proceeds to **MURRAY**. If the victims did not provide him with all proceeds, **MURRAY** punished them. Several of **MURRAY**'s victims from between 2015 to 2017 stated that they could keep a portion of the commercial sex proceeds, but that the money had to be used to purchase drugs from **MURRAY**. Thus, all portions of the commercial sex proceeds were ultimately turned over to **MURRAY**. The victims' descriptions of **MURRAY**'s conduct is consistent with my training and experience with sex trafficking cases. Perpetrators of such crimes attempt to control their victims' finances, freedoms (such as decision-

making authority), and outside contacts to limit their ability to escape the scheme and maximize the exploiter's profits.

14. Each victim described travelling across multiple states to complete commercial sex acts at **MURRAY's** direction. The victims described traveling between Virginia, Maryland, Pennsylvania, North Carolina, West Virginia, New York, New Jersey, and Florida, as well as potentially other states.

15. Each victim stated that **MURRAY** advertised commercial sex via the internet using a variety of commercial sex websites. **MURRAY** controlled and posted advertisements for the victims. The victims did not know all the websites **MURRAY** used, but reported he posted on Skipthegames.com<sup>3</sup>, Backpage.com, Megapersonal.com, and the phone application, Snapchat<sup>4</sup>.

16. Multiple victims stated that **MURRAY** rented hotel rooms across the United States to be used for commercial sex dates. **MURRAY** sometimes used victims to facilitate these rentals and gave them fake IDs to book the hotel rooms.

17. Multiple victims stated that **MURRAY** continually sought to recruit new victims. **MURRAY** often targeted females who appeared to be addicted to narcotics, usually heroin. **MURRAY** targeted these women because **MURRAY** was able to exploit their drug addiction to coerce them to engage in commercial sex acts at **MURRAY's** direction.

18. Multiple victims stated that **MURRAY** used physical violence to coerce obedience from victims. Almost all the victims were either subjected to **MURRAY's** violence themselves or saw **MURRAY** use violence on other individuals. For instance, one act of violence by

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<sup>3</sup> Based on my training and experience as an agent, websites such as Skipthegames.com, Backpage.com, and Megapersonal.com, are routinely used to post advertisements for commercial sex. Prospective clients can search these commercial sex websites to view advertisements and obtain contact information for the commercial sex workers to arrange commercial sex acts.

<sup>4</sup> Snapchat is a social media application that is commonly used to send pictures or messages to other Snapchat users. Snapchat provides users the option to automatically delete messages or pictures that were sent after a certain amount of time.

**MURRAY** caused AV2 to be hospitalized for injuries sustained from his physical assault of her. Victims who were not subject to **MURRAY**'s physical violence stated that they knew what would happen if they disobeyed **MURRAY**, which meant the present threat of violence pressure their compliance with his demands. Almost every victim stated that **MURRAY** always had a firearm on him.

19. Each victim stated they tried to leave **MURRAY** at least once, however, **MURRAY** found them. None of the victims knew how **MURRAY** tracked them down after they left him. Based on my training and experience, I know that sex trafficking victims often fear there is no escape from the perpetrators of sex trafficking controlling their lives. This fear often causes victims to return to their abusers and/or discourages their perceived viability of flight. Relatedly, each victim stated that **MURRAY** prevented victims from leaving through either the application of physical abuse, emotional abuse, or drug coercion. Numerous victims stated that they are still in fear of **MURRAY** and what he will do to them.

**B. Corroboration of Sex Trafficking Victim Statements by Investigators**

20. Investigators have corroborated many of the statements made by victims regarding **MURRAY**'s criminal activities. Investigators reviewed forensic downloads of cellular telephones recovered from **MURRAY** and AV2 in July 2022. Photographs found in the telephones show several of the victims identified in this investigation, which is consistent with **MURRAY** using their images to post advertisements on commercial sex websites.

21. Investigators also corroborated statements made by victims claiming that **MURRAY** maintained strict control over their activities. Review of the cellphones revealed **MURRAY** received regular updates from victims regarding when and where they were completing commercial sex transactions, the duration of these transactions, and the amount of proceeds earned.

22. The cellphones also detailed **MURRAY**'s control over the victims, such as the women asking permission to go somewhere, close a window, or even eat. For example, on July 17, 2022, the following text exchange<sup>5</sup> occurred between **MURRAY**'s personal cellphone and a cellphone<sup>6</sup> he gave one of the women to use:

-0944: dad<sup>7</sup> that's 4 people now I don't know what to do you told me I could not leave room without speaking with you first I asked your friend to go down he said you told him to stay in here I'm so confused I'm trying to make things happen and I can not reach you

-0944: u get this text

**MURRAY:** Stop taking to customers period

**MURRAY:** U are talking to much to the clients

**MURRAY:** I ask u to not talk at all Keep it very simple

**MURRAY:** Stop talking to the date And others Just don't open ur mouth Collect money and shit the fuck up

**MURRAY:** Shut

**MURRAY:** U already told me he was leaving

**MURRAY:** Stop calling

23. The cellphones also corroborate that **MURRAY** set the prices and quotas of commercial sex proceeds to be earned. The phones also detail the large number of commercial sex acts **MURRAY** expected his victims to complete each day. An example of a text exchange between **MURRAY** and a victim occurred on or about May 15, 2022, and stated as follows, aside from one redaction of an address:

**MURRAY:** [REDACTED ADDRESS], NC 28405 United States

-0944: Ok

**MURRAY:** Give address out now

**MURRAY:** Let's GET cAUGht tHre hell Up .....

**MURRAY:** No sleeeppeeeee

-0944: Yes

-0944: Ok

**MURRAY:** We need money From

<sup>5</sup> The text messages are transcribed the way they appear on the phone extractions.

<sup>6</sup> The phone number associated with this phone ended in -0944 and will be referred to as such.

<sup>7</sup> Based on my training and experience, the term "daddy" or "dad" is often used to describe a pimp.

**MURRAY:** Fast  
**MURRAY:** Fast  
**MURRAY:** Fast

...

**MURRAY:** Start booking

**-0944:** Ok

**MURRAY:** 120qv/200hh/300hr<sup>8</sup>

**-0944:** Ok

**MURRAY:** 120\$ should get the going

24. Based on my training and experience, the above-excerpted exchange shows **MURRAY** set prices for the victims to charge during the commercial sex acts (e.g., \$300 for an hour-long “date”). These messages also show **MURRAY** instructed the victims to work without sleep so that they can earn money for **MURRAY** (e.g., “No sleeepreeeee”).

25. Investigators also corroborated the victims’ claims of traveling across multiple states to complete commercial sex acts at **MURRAY**’s direction. Through a review of **MURRAY**’s cellphone, investigators discovered hotel reservations and commercial sex advertisements from numerous states, including Virginia. There are also text messages from **MURRAY** to the victims where he provided the victims with the hotel addresses for them to give to clients.

26. Investigators corroborated the victims’ claims that some of the commercial sex proceeds were transferred to **MURRAY** through CashApp. Review of both the victims’ cellphone and **MURRAY**’s cellphone show CashApp transfers from clients to CashApp accounts associated with **MURRAY**.

27. Investigators corroborated the victims’ claims that **MURRAY** advertised them for commercial sex acts using a variety of websites. Commercial sex advertisements have been linked to **MURRAY** through investigative methods including, but not limited to, querying the native

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<sup>8</sup> Based on my training and experience, “qv” means “quick visit,” which is typically a date that lasts 15 minutes or less. “hh” means “half hour,” which typically means the date will last no longer than half an hour. “hr” means “hour,” which typically means that the date will last no longer than one hour.



numbers of cellular telephones recovered from **MURRAY**, analysis of electronic devices seized during search warrants resulting in the recovery of preserved advertisements, and image searches for advertisements featuring the true images of identified victims. These investigative methods resulted in the discovery of numerous commercial sex advertisements linked to **MURRAY**. These commercial sex advertisements were posted on the websites Backpage.com, CityXGuide.com, SkiptheGames.com, Craigslist.com, MegaPersonal.com, EscortBabylon.com, and others.

28. Investigators corroborated the victims' statements that **MURRAY** used narcotics as a form of coercion to force compliance with his demands. Each victim stated **MURRAY** withheld narcotics as a form of punishment. Below is an example of a text messages sent by **MURRAY** to a victim. These messages were sent on or about May 31, 2022 and they insinuated narcotics would withheld until the victim obeyed **MURRAY** (i.e., "nothing" will be provided until what he asked for is "complete"):

**MURRAY:** U fucked this up

**MURRAY:** There will be nothing until . . . . what I said is complete

**MURRAY:** Go the fuck inside and wait . . . .

**MURRAY:** Don't fucking wait across from the fucking office

**MURRAY:** U already made it FUCKING HOT

**MURRAY:** Don't go out

**MURRAY:** U made it hot

### **C. Trafficking of AV2**

29. As part of the investigation, law enforcement located and interviewed AV2. AV2 stated that she met **MURRAY** in or around December of 2021 in Wilmington, North Carolina and was trafficked by him until on or about July 24, 2022.

30. When AV2 first met **MURRAY**, she was homeless and addicted to crack cocaine. **MURRAY** told AV2 that he would give her a ride home, which AV2 accepted. Once AV2 got in the car, **MURRAY** provided AV2 with what she believed was crack cocaine. After taking the

narcotics, AV2 became drowsy and fell asleep. AV2 stated that the provided drugs had a different effect on her than crack cocaine normally does in her system. Instead of taking AV2 home, **MURRAY** took her and two other female victims to his residence in Alexandria, Virginia. AV2 was offered a place to stay and drugs if she took care of **MURRAY**'s animals. At some point during the drive to Virginia, **MURRAY** took AV2's identification and phone.

31. Eventually, **MURRAY** started posting advertisements for AV2 on commercial sex websites and setting up dates for AV2. At **MURRAY**'s direction, AV2 was expected to engage in any sexual act the clients requested. AV2 stated that she was never allowed to keep any of the money and turned over all commercial sex proceeds to **MURRAY**.

32. During AV2's time with **MURRAY**, he frequently took her and others to Winchester, Virginia, which falls within the Western District of Virginia. During these visits to Winchester, **MURRAY** arranged for the victims to engage in commercial sex acts. For example, on or about July 23, 2022, **MURRAY** set up a date for AV2 and another female victim with a client who lived in West Virginia. **MURRAY** drove AV2 and the other female victim from Winchester, Virginia to the client's house in West Virginia. While at the client's house, AV2 and the other female victim engaged in sexual activity in exchange for payment. After the date was completed, **MURRAY** arranged for an Uber to drive AV2 and the other woman from the client's house to a gas station in West Virginia. **MURRAY** met AV2 and the other woman at the gas station and transported them back to Winchester, Virginia. All the proceeds from this commercial sex act were given to **MURRAY**.

33. To enforce obedience, **MURRAY** used physical violence against AV2 on multiple occasions. AV2 described one instance when she tried to leave **MURRAY** and he found her. **MURRAY** dragged AV2 across the asphalt and told her if she thought this punishment was bad, to "wait to see what happens" next time. On another occasion, when AV2 tried to leave

**MURRAY**, he held a gun to her head. **MURRAY** also used a former police dog trained in subject compliance to threaten or attack AV2 if she disobeyed. **MURRAY** sometimes made AV2 eat dog food as a punishment.

34. **MURRAY** controlled AV2's supply of narcotics. **MURRAY** did not allow AV2 or any of the other victims to obtain narcotics from other individuals. **MURRAY** used his control of AV2's drug supply as a form of punishment and reward. If AV2 did what **MURRAY** told her to do, he provided the drugs. If AV2 disobeyed **MURRAY**'s rules, **MURRAY** withheld narcotics from AV2. The use of narcotics to compel the women to earn money for **MURRAY** through commercial sex acts was consistent across the years and across the victims.

35. AV2 stated **MURRAY** forced AV2 to take ecstasy in order to keep AV2 awake and able to conduct dates with clients.

36. AV2 stated she tried to leave **MURRAY** on multiple occasions, but **MURRAY** somehow always found her. AV2 never knew how **MURRAY** found her when she left. **MURRAY** used multiple methods to prevent her from leaving. **MURRAY** told her that if she ever tried to leave, he would find her and punish her. On at least one occasion, **MURRAY** showed AV2 a picture of one of AV2's friends and told AV2 that he would kill her friend if she ever tried to leave.

37. AV2 stated that she still fears **MURRAY** and believes he would harm her if he knew she was cooperating with law enforcement.

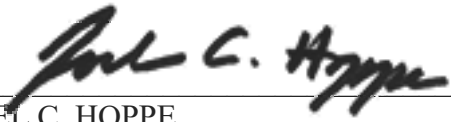
### **III. CONCLUSION**

42. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning in or around December of 2021 until on or about July 24, 2022, within the Western District of Virginia and elsewhere, **William Oneil MURRAY III**

committed the offense of sex trafficking through force, fraud and coercion, a violation of 18 U.S.C. §§ 1591(a) and (b)(1) as related to AV2.

/s/Melissa A. Macaron  
Melissa A. Macaron  
Special Agent  
Federal Bureau of Investigations

Received by reliable electronic means and sworn and attested to by telephone on this  
27th day of March 2023.

  
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JOEL C. HOPPE  
United States Magistrate Judge

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[UNDER SEAL]